



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET, Rm. 3-177
NEW YORK, NY 10007

ZACHARY W. CARTER
Corporation Counsel

ARTHUR G. LARKIN
Senior Counsel
Phone: (212) 356-2641
Fax: (212) 356-3509
alarkin@law.nyc.gov

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BY ECF

Hon. Laura Taylor Swain
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: Mark Nunez v. City of New York, et al., 11-CV-5845 (LTS) (JCF)

Your Honor:

We write with the consent of all parties and the Court-appointed monitor, and in furtherance of our three prior letter requests that Your Honor granted (Dkt. 273, 276, 278), in order to seek an additional extension of three (3) weeks of the deadline by which the City must move for a protective order to keep confidential certain information that the Department of Correction ("DOC") has produced. The current deadline is today, July 20, 2016, and the City seeks an extension of the deadline to August 10, 2016. As we advised Your Honor previously, DOC, plaintiffs' counsel and the monitor are attempting to resolve all of the issues through negotiation, and at this point, the parties have narrowed their disputes to one final area. Because only one area remains outstanding, we are hopeful that the parties can resolve their differences without Court intervention. We respectfully request three additional weeks to attempt to do so, however, because of counsels' summer vacation plans. Again, we appreciate the Court's time regarding these matters.

Respectfully submitted,

/s/

Arthur G. Larkin, Esq.
Senior Counsel

cc: All Counsel (by ECF)